



**IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA**

**FILED IN DISTRICT COURT
OKLAHOMA COUNTY**

JANA M. TURK

Plaintiff,

vs.

LYNN MARLENE FREEMAN
AN INDIVIDUAL,
and
DOWELL TRANSPORT, INC.,
AN ARKANSAS CORPORATION

Defendants.

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Case No.: CJ-2017-1922

MAY 17 2017
RICK WARREN
COURT CLERK

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FIRST AMENDED PETITION

COMES NOW the Plaintiff, Jana M. Turk, who alleges and states as follows:

1. Plaintiff is a resident of Canadian County, State of Oklahoma and was at the time of the accident. Defendants were residents of the State of Arkansas at the time of the accident.

2. On or about the 4th day of April, 2015, at approximately I-40 and Macarthur, Oklahoma City, Oklahoma, Jana M. Turk was operating her vehicle in a safe and prudent manner while Eastbound on Interstate I-40. At approximately 11:30 a.m., Lynn Marlene Freeman, operating a semi-truck owned by Dowell Transport, Inc., of Batesville, State of Arkansas, and traveling East on Interstate I-40 in Oklahoma City, negligently crossed into the lane of Jana M. Turk and struck her vehicle on the driver's side. The vehicle operated by Jana M. Turk was dragged some distance and rotated around in front of the semi truck and was pushed down the interstate highway for some distance before becoming dislodged from the truck.

Exhibit

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exhibitstic-ker.com

The semi truck, driven by defendant Freeman, failed to stop after the accident and proceeded down the Highway.

3. As a result of the Defendant's negligence described in paragraph "2" above, Plaintiff sustained serious personal injuries; has and will suffer pain of body and mind and has and will incur medical expenses and has lost the use of her vehicle.

4. Plaintiff was without knowledge of the name of the defendant driver and filed the initial Petition naming John Doe & Employer. Plaintiff has since learned the driver's name and the name of the trucking company and now files this First Amended Petition.

5. WHEREFORE, Plaintiff demands judgment against the Defendants in an amount that exceeds the threshold amount for Federal Court Diversity Jurisdiction, together with costs and such other legal and equitable relief as the Court deems just and proper.

Respectfully submitted,



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Attorney for Plaintiff

**ATTORNEYS LIEN CLAIMED
JURY TRIAL DEMANDED**